

The Claims have been rejected under 35 U.S.C. § 103 as being obvious on various grounds, all of which rely upon the combination of Poetsch and Diermann. Based upon the explanation of these references, below, Applicants claims are clearly distinguishable over the cited references and are neither anticipated nor rendered obvious.

First, the Poetsch reference must be understood in detail. While the Poetsch reference does describe a technique for 'compensating for distortion of film exposed through anamorphic lenses' (Abstract) it does so in a wholly different way from that claimed in the instant application. Specifically, Poetsch disclosed two techniques, both of which are substantially different from the claimed technique.

First, Poetsch discloses a technique in which the anamorphic image is in essence scanned at the standard anamorphic rate. While the film is scanned at a "non-anamorphic" rate, only half of the information is stored. The specification clearly discloses that the information for every other line is written over. As stated at Col. 6, starting at line 30:

"The scanning arrangement permits a simple way of so reproducing cinemascope film without using an anamorphic lens while scanning the full width of the image. This is achieved by so arranging the addresses in which the signals are stored upon scanning that, when the signals are read out from the memory, the

image to be reproduced will be reduced by half with respect to the height of the TV screen. Switches 26, 27 (Fig. 1), when placed in their upper position, provide a division by two; consequently, the line counter will receive only every other count pulse and only every other line which is scanned receives a new address. The content of two lines is thus recorded in the same address in the memory. Consequently, the image content of the overall frame is reduced to half the number of lines for reproduction of the scene on the TV screen." (6:30-45).

In this first embodiment, only half of the scanned information is stored.

In a second embodiment, Poetsch provides for anamorphic correction by enlarging the image and then changing the scan rate. This approach is shown in Fig. 3 and described generally in the specification at Col. 7, from lines 19-52. By enlarging the image and changing the scan rate, the anamorphic aspect is compensated for.

As such, Poetsch wholly lacks critical claim elements, such as in Claim 1 the step of "storing the scan lines in memory" since in the first embodiment of Poetsch half of the information scanned is not stored in memory since it is immediately written over by the succeeding scan and the claim element of "forming a

video output line" also is not performed since no combining, i.e., "forming", is done.

In Claim 9 there is no "combining" or "forming a next video output line".

In Claim 15, no "weighting" or "summing" means are present. Numerous other differences exist, but these establish patentability.

Critically, there is absolutely no teaching or suggestion of combining any scan lines to provide an output. This critical deficiency is recognized by the Examiner in his resort to the Diermann reference (discussed below). Poetsch is completely devoid of any teaching of combining scan lines such that in conjunction they generate an output line. Indeed, the only combining done by Poetsch is that done as described at Column 6 where data is written literally over the preceding data line. In no sense is this data "combined" for output.

The Diermann reference is deficient for at least two critical reasons. First, Diermann is directed to a comb filter. The Diermann reference is not within the pertinent art. Specifically, Diermann does not go to image processing technology. Rather, a comb filter is used to separate out luminance and chrominance signals. Indeed, the portion of Diermann at Column 75 relied upon by the Examiner expressly affirms this point. The comb filter of Diermann simply is not a pertinent reference.

Second, assuming that Diermann is to be considered as prior art, it is wholly deficient from a substantive standpoint. The "successive television lines" which are combined to separate out the chrominance and luminance information are electronic signals representative of the encoded color television signal, not a "film" as claimed. As such, the Diermann reference is wholly inapplicable from a substantive standpoint.

Applicants believe that all of the rejections to the specific claims suffer from the deficiencies outline above. Accordingly, it is believed that all of the claims as presented are patentable.

Applicants request allowance of the claims as presented. Should minor matters remain, Applicant requests that the undersigned be contacted by telephone to expedite allowance of this application.

Respectfully submitted,

LYON & LYON

By David B. Murphy
DAVID B. MURPHY
Reg. No. 31,125

DBM/dnd
611 West Sixth Street
Los Angeles, CA 90017
(714) 751-6606 or (213) 489-1600